

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

MATTHEW MORROW-WU and SHANGZHEN
WU,

Defendants.

Docket No. 23 Cr. 90 (AKH)

MOTION TO FILE UNDER SEAL

Defendant Shangzhen Wu, through his undersigned attorney, will and hereby does respectfully move this Court before the Honorable Alvin K. Hellerstein, Senior United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, for permission to file the Declaration of Mark I. Cohen *ex parte* and under seal because it reveals defense trial strategy. This information is relevant to Mr. Wu's Motion to Suppress, but Mr. Wu may be prejudiced by early disclosure of his trial strategy to the Government and co-defendant Morrow.

Dated: September 10, 2024

Respectfully submitted,



Mark I. Cohen, Esq.
Cohen, Frankel & Ruggiero, LLP
20 Vesey Street, Suite 1200
New York, New York 10007
212-732-0002
mcohen@cfrlaw.net

Attorney for Defendant Shangzhen Wu

The motion to seal is granted. The defendant may file the declaration of Mark I. Cohen under seal, to be maintained by the clerk. A redacted version of the document must be filed on the public docket. The clerk shall terminate ECF No. 91.

SO ORDERED.

Dated: 9/12/24
New York, New York

/s/ Alvin K. Hellerstein
ALVIN K. HELLERSTEIN
United States District Judge